

XX/XX/XXXX

Fed Ex No.: XXXX XXXX XXXX

Technical Management Section
South Carolina Department of Health and
Environmental Control
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201-1708

Re: New-Indy Catawba Semi-Annual Reporting; January 1, 2021 – June 30, 2021
Air Permit Nos. TV-2440-0005 and 2440-0005-DF

Technical Management Section:

On July 23, 2021, the New-Indy Catawba LLC mill located at 5300 Cureton Ferry Road in Catawba, South Carolina submitted a semi-annual report in compliance with the reporting requirements of Title V Operating Permit (TVOP) No. TV-2440-0005 for the January 1, 2021 through June 30, 2021 reporting period. The New-Indy Catawba mill is also subject to reporting requirements of State Construction Permit (SCP) No. 2440-0005-DF and, although the July 23, 2021 report did not explicitly identify the SCP conditions, all information required to be reported by the SCP was included with the July 23, 2021 report.

On August 11, 2021 the South Carolina Department of Health and Environmental Control (SC DHEC) requested that the New-Indy mill include the information required by the SCP as part of a revised semi-annual report. This revised submittal now identifies the corresponding SCP conditions with each reported data element.

Semi-annual reporting requirements in Section C of the TVOP and SCP Permits are outlined in this revised report, and detailed in Attachment A. Additional National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements are included in Attachment B. The following table identifies each revision from the original July 23, 2021 report.

Original Condition	Page Number	Revision
TV-2440-0005, C.4	6	Added SCP No. 2440-0005-DF, C.3 and revised "2610C" to "2610C1."
TV-2440-0005, C.11	6	Added SCP No. 2440-0005-DF, C.7.
TV-2440-0005, C.13	6	Added SCP No. 2440-0005-DF, C.15 and C.18. Added equipment ID No. 5230 and 5255. Added regulation NSPS BBa. Revised text to reference NESHAP Subpart S report in Attachment B for excess emissions summary information.
TV-2440-0005, C.23	9	Added SCP No. 2440-0005-DF, C.9.

Original Condition	Page Number	Revision
TV-2440-0005, C.53	19	Added SCP No. 2440-0005-DF, C.15 and C.18. Revised regulation to include NSPS BBa. Revised text to reference NESHAP Subpart S report in Attachment B for excess emissions summary information.
TV-2440-0005, C.71	23	Added SCP No. 2440-0005-DF, C.15 and C.18. Revised regulation to include NSPS BBa. Revised text to reference NESHAP Subpart S report in Attachment B for excess emissions summary information.
N/A	Attachment A	Revised the "Continuous Emission Monitor Report Log High Volume Low Concentration Gas System" list of equipment IDs and permit conditions to include 5230, 5255, and SCP No. 2440-0005-DF C.15 and C.18.
N/A	Attachment A	Revised the "Continuous Emission Monitor Report Log Low Volume High Concentration Gas System" list of equipment IDs and permit conditions to include 2400 and SCP No. 2440-0005-DF C.15 and C.18.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Daniel Mallett at (803) 981-8010 or Dan.Mallett@new-indycb.com.

Sincerely,

Charles Cleveland
Technical Manager

Attachments: Attachment A: Excess Emissions and Continuous Emissions Monitor Report Logs
Attachment B: Additional NESHAP Requirements

cc: EPA Region 4
SCDHEC – BAQ, Air Toxics Section
Allie Dabney, Midlands EQC Lancaster
Environmental File 208.21

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TV-2440-0005, Condition C.4 and 2440-0005-DF, Condition C.3

Emission Unit IDs:	02, 03, 04, 06, 07, 08, 09
Equipment IDs:	5210, 5220, 5230, 5240, 5250, 5300, 5300C, 1790, 1790C, 1790Ca, 9700, B-2000, 2505, 2510, 2520, 5105, 5110, 5120, 2723, 2700 (No. 4 Causticizer), 2701, 2702, 2703, 2400, 2500, 5100, 2505C, 5105C, 2723C, 2511C, 2725C, 2726C, 2724C, 2605, 3705, 5260, 5260C, 5270, 2605C, 2610C1, 3705C, 3710C1, 9800, 9801, 9802
Regulation:	S.C. Regulation 61-62.1, Section II; S.C. Regulation 61-62.70.6.a.3.i.B
Description:	Monitoring parameter readings and inspection checks are maintained in logs. Instances of operation outside operational ranges including date, time, cause and correction action taken.

See Attachment A.

TV-2440-0005, Condition C.11 and 2440-0005-DF, Condition C.7

Emission Unit IDs:	01
Equipment IDs:	1300
Regulation:	SC Std. 4 and SC Std. 62.6 opacity and fugitive emission limitations
Description:	Opacity limit of 20%. Visual emissions inspections of the woodyard on a semi-annual basis.

There were no instances of abnormal visual observations recorded during the reporting period.

TV-2440-0005, Condition C.13 and 2440-0005-DF, C.15 and C.18

Emission Unit IDs:	02
Equipment IDs:	5210, 5230, 5250, 5255, 2605, 3705, 5270
Regulation:	NSPS BB and BBa
Description:	Continuous monitoring from B&W No.1 Combination Boiler 1, B&W No.1 Combination Boiler 2, and the HVLC Collection System

Semi-annual compliance is summarized in the Tables 1 and 2 below. Detailed information can be found in Attachment A. Attachment B includes summary information for excess emissions from the HVLC system under the 40 CFR Part 63, Subpart S report.

Table 1. Continuous Emissions Monitoring Summary – Combination Boiler 1 Opacity (2605)

	1 st Quarter	2 nd Quarter	Semi-Annual Period
Monitor Downtime (%)	0.26	0.02	0.14
Emissions Discrepancies (%)	0.05	0.07	0.06
Overall Compliance (%)	99.69	99.91	99.80

Table 2. Continuous Emissions Monitoring Summary – Combination Boiler 2 Opacity (3705)

	1st Quarter	2nd Quarter	Semi-Annual Period
Monitor Downtime	0.11	0.25	0.18
Emissions Discrepancies (%)	0.17	0.02	0.10
Overall Compliance (%)	99.72	99.73	99.73

Table 3. Continuous Emissions Monitoring Summary – HVLC Collection System (5270)

	1st Quarter	2nd Quarter	Semi-Annual Period
Monitor Downtime	N/A	N/A	N/A
Emissions Discrepancies (%)	2.82	0.16	1.24
Overall Compliance (%)	97.18	99.84	98.76

TV-2440-0005, Condition C.14

Emission Unit IDs:	02, 08
Equipment IDs:	5210, 5240, 2400, 5100, 2605, 3705, 5260, 5260C
Regulation:	SC Reg. 61-62.5 Standard No. 7 {Prevention of Significant Deterioration}
Description:	Daily Unbleached Pulp Production

The daily unbleached pulp production is limited to 1,825 air dried tons unbleached pulp (ADTUBP) per day (12-month rolling average). The rolling average pulp mill production did not exceed the limit during the reporting period.

Table 4. Pulp Mill Daily Production

Month	12-Month Rolling Average (ADTUBP/day)	Corrective Actions Taken if Exceedance Occurred
January-20	1,074	N/A
February-20	1,081	N/A
March-20	1,078	N/A
April-20	1,078	N/A
May-20	1,062	N/A
June-20	1,098	N/A
July-20	1,060	N/A
August-20	1,024	N/A
September-20	953	N/A
October-20	851	N/A
November-20	773	N/A
December-20	687	N/A
January-21	668	N/A
February-21	711	N/A
March-21	750	N/A
April-21	789	N/A
May-21	857	N/A
June-21	788	N/A

TV-2440-0005, Condition C.15

Emission Unit IDs:	03
Equipment IDs:	5300, 5300C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Bleach Plant Scrubber Opacity

The Bleach Plant was permanently retired from service on September 5, 2020. Therefore, there were no excess emissions to report during the reporting period.

TV-2440-0005, Condition C.16

Emission Unit IDs:	04
Equipment IDs:	1790, 1790C, 1790Ca
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	ClO ₂ Generator Opacity

The Chlorine Dioxide Plant was permanently retired from service on September 5, 2020. Therefore, there were no excess emissions during the reporting period.

TV-2440-0005, Condition C.19

Emission Unit IDs:	05
Equipment IDs:	4400
Regulation:	SC Reg. 61-62.5 Standard No. 7 {Prevention of Significant Deterioration}
Description:	Thermo-mechanical pulp production

The thermo-mechanical pulping (TMP) process is limited to 384,900 air dried tons of pulp (ADTP) per year. The TMP process was shut down on May 11, 2020 and did not operate during the reporting period. TMP production did not exceed 384,900 ADTP per year on a 12-month rolling sum during the reporting period.

Table 5. Thermo-Mechanical Pulp Production

Month	Monthly Sum (ADTP / month)	12-Month Rolling Sum (ADTP/yr)
January-20	7,806	83,396
February-20	7,143	83,002
March-20	8,380	82,415
April-20	7,117	80,383
May-20	1,967	75,333
June-20	0	70,486
July-20	0	65,728
August-20	0	57,914
September-20	0	57,577
October-20	0	44,106
November-20	0	39,698
December-20	0	32,413
January-21	0	24,607
February-21	0	17,464
March-21	0	9,084
April-21	0	1,967
May-21	0	0
June-21	0	0

TV-2440-0005, Condition C.23 and 2440-0005-DF, Condition C.9

Emission Unit IDs:	06
Equipment IDs:	4600, 4605, 4610, 4100, 4110, 2100, 9701A, 9701B, 9702, 9703, 9704, 2000, 2005, 2010
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Papermill Opacity Monitoring

Visual opacity monitoring is performed while emission units combust fuel other than propane or natural gas. If opacity deviations occur, the cause and corrective action are listed in Table 6 below. No observations of abnormal emissions occurred during the reporting period.

Table 6. Papermill Visible Emissions

ID	Source Description	Cause/Corrective Action for Abnormal Emissions
4100	Opacity No. 3 Paper Machine	N/A
2100	Pulp Dryer	N/A

TV-2440-0005, Condition C.26

Emission Unit IDs:	06
Equipment IDs:	4610
Regulation:	(S.C. Regulation 61-62.1, Section II; S.C. Regulation 61-62.70.6.a.3.i.B)
Description:	No. 2 Coater Dryer Fuel Usage

The No. 2 Coat Dryer was permanently retired from service on September 5, 2020. Therefore, there was no fuel usage during the reporting period.

TV-2440-0005, Condition C.27

Emission Unit IDs:	06
Equipment IDs:	9700, B-2000
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Starch Silo Opacity

The Starch Silo was permanently retired from service on September 5, 2020. Therefore, there were no abnormal emissions during the reporting period.

TV-2440-0005, Condition C.28

Emission Unit IDs:	06
Equipment IDs:	9700, B-2000
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	PM Visual Inspections

The Starch Silo was permanently retired from service on September 5, 2020. Therefore, there were no excursions during the reporting period.

TV-2440-0005, Condition C.29

Emission Unit IDs:	06
Equipment IDs:	4120, 4130
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions from Fuel Burning Operations}
Description:	Infrared Dryer and Hot Oil Heating System

The Infrared Dryer and Hot Oil Heating System were permanently retired from service on September 5, 2020. Therefore, there were no abnormal emissions during the reporting period.

TV-2440-0005, Condition C.30

Emission Unit IDs:	06
Equipment IDs:	4120, 4130
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions from Fuel Burning Operations}
Description:	Infrared Dryer and Hot Oil Heating System

Source ID 4120 did not operate during the reporting period and has not operated since 2013. Source ID 4130 also did not operate during the reporting period.

Month	Natural Gas (MMBtu)	12-Month Rolling Sum
January-20	3,669	35,315
February-20	3,607	36,008
March-20	4,185	36,309
April-20	3,201	34,972
May-20	989	32,870
June-20	0	31,584
July-20	0	29,929
August-20	0	26,370
September-20	0	24,433
October-20	0	20,899
November-20	0	18,656
December-20	0	15,652
January-21	0	11,982
February-21	0	8,375
March-21	0	4,191
April-21	0	989
May-21	0	0
June-21	0	0

TV-2440-0005, Condition C.32

Emission Unit IDs:	06
Equipment IDs:	9900
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions from Fuel Burning Operations}
Description:	Paper Machine Air Makeup Units Fuel Usage

Fuel usage for Source 9900 is listed below in Table 8. This source is permitted to burn 631,540,000 standard cubic feet of natural gas/year (total for all units) and 1,428,571 gallons of propane per year (total for all units). This source did not operate during the reporting period.

Table 7. Air Makeup Unit Fuel Usage

Month	Natural Gas (scf)	12-Month Rolling Sum	Propane (gallons)	12-Month Rolling Sum
January-20	0	478	0	0
February-20	0	376	0	0
March-20	1	290	0	0
April-20	65	309	0	0
May-20	1	288	0	0
June-20	0	261	0	0
July-20	0	215	0	0
August-20	0	151	0	0
September-20	0	83	0	0
October-20	0	68	0	0
November-20	0	67	0	0
December-20	0	67	0	0
January-21	0	67	0	0
February-21	0	67	0	0
March-21	0	66	0	0
April-21	0	1	0	0
May-21	0	0	0	0
June-21	0	0	0	0

TV-2440-0005, Condition C.33

Emission Unit IDs:	06
Equipment IDs:	4110
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}
Description:	Air Flotation Dryer Fuel Usage

The Air Flotation Dryer was permanently retired from service on September 5, 2020. Therefore, there was no fuel usage during the reporting period.

TV-2440-0005, Condition C.35

Emission Unit IDs:	06
Equipment IDs:	4610, 9900
Regulation:	SC Reg. 61-62.1, Section. II(E) {General Requirements-Synthetic Minor}
Description:	No. 2 Coater Dryer and the Paper Machine Air Make Up Units Fuel Consumption

See Sections TV-2440-0005, Condition C.26 and TV-2440-0005, Condition C.32 of this Report.

TV-2440-0005, Condition C.37

Emission Unit IDs:	07
Equipment IDs:	2515, 2520, 2700, 2702, 2703, 5115, 5120
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Chemical Recovery Visible Emissions

Visual opacity monitoring is performed for the above listed sources at the frequency listed in Table 10. If opacity deviations occur, the cause and corrective action are also listed in Table 10 below. No abnormal emissions were observed during the reporting period.

Table 8. Chemical Recovery Visible Emissions

ID	VE Frequency	Source Description	Cause/Corrective Action for Abnormal Emissions
2515	Semi-annual	No. 2 Recovery Furnace Precipitator Mix Tank	N/A
2520	Semi-annual	Salt Cake Mix Tank	N/A
5115	Semi-annual	No. 3 Recovery Furnace Precipitator Mix Tank	N/A
5120	Semi-annual	No. 3 Salt Cake Mix Tank	N/A
2700	Semi-annual	Causticizing Equipment	N/A
2702	Daily	Purchased Lime Silo	N/A
2703	Daily	Returned Lime Silo	N/A

TV-2440-0005, Condition C.39

Emission Unit IDs:	07
Equipment IDs:	2505, 2505C, 2723, 2723C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NESHAP, Subpart MM
Description:	No. 2 Recovery Furnace and No. 2 Lime Kiln Opacity

Information regarding the No. 2 Recovery Boiler Opacity monitor can be found in Table 11. Excess emissions and COMS downtime are summarized in Table 12. Detailed Information is provided in Attachment A.

Table 9. No. 2 Recovery Boiler Opacity Monitoring

Process Unit Description:	No. 2 Recovery Boiler
Pollutant:	Opacity
Time Period:	Minutes
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 20, 2006 Last Audit Date: May 4, 2021
Total Source Operating Time in Reporting Period:	250,034 Minutes

Table 10. No. 2 Recovery Boiler Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	Duration (minutes)	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	42	174
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	5	4
Excess Emissions/Process Operating Time	0.02%	N/A
Monitor Downtime Summary		
Reason for Monitor Downtime	Duration (minutes)	
Monitor Equipment Malfunctions	587	
Non-Monitor Equipment Malfunctions	0	
Quality Assurance	116	
Other Known Cause	0	
Other Unknown Cause	0	
Total Number of Incidents	13	
Percent Monitor Downtime	0.28%	

Information regarding the No. 2 Lime Kiln Opacity monitor can be found in Table 13. Excess emissions and COMS downtime are summarized in Table 14. Detailed Information is provided in Attachment A.

Table 11. No. 2 Lime Kiln Opacity Monitoring

Process Unit Description:	No. 2 Lime Kiln
Pollutant:	Opacity
Time Period:	Minutes
Emission Limits:	20%
Monitor Manufacturer(s) and Model Number(s):	Monitor Labs USI 550 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 27, 2012 Last Audit Date: May 3, 2021
Total Source Operating Time in Reporting Period:	217,700 Minutes

Table 12. No. 2 Lime Kiln Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	Duration (minutes)	
	Over 20%	Over 20% for 60 minutes
A. Startup/Shutdown	414	60
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	18	0
Fuel Problems	0	0
Other Known Cause	12	0
Other Unknown Cause	0	0
Total Number of Incidents	10	1
Excess Emissions/Process Operating Time	0.20%	N/A
Monitor Downtime Summary		
Reason for Monitor Downtime	Duration (minutes)	
Monitor Equipment Malfunctions	26	
Non-Monitor Equipment Malfunctions	10	
Quality Assurance	277	
Other Known Cause	30	
Other Unknown Cause	0	
Total Number of Incidents	9	
Percent Monitor Downtime	0.16%	

TV-2440-0005, Condition C.40

Emission Unit IDs:	07
Equipment IDs:	2510, 5110, 2511C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	No. 2 and No. 3 Smelt Dissolving Tank Opacity

See Attachment A.

TV-2440-0005, Condition C.41

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NSPS, Subpart BB
Description:	No. 3 Recovery Boiler Opacity

Information regarding the No. 3 Recovery Boiler Opacity monitor can be found in Table 15. Excess emissions and COMS downtime are summarized in Table 16. Detailed Information is provided in Attachment A.

Table 13. No. 3 Recovery Boiler Opacity Monitoring

Process Unit Description:	No. 3 Recovery Boiler
Pollutant:	Opacity
Time Period:	Minutes
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: July 31, 2010 Last Audit Date: May 4, 2021
Total Source Operating Time in Reporting Period:	249,505 Minutes

Table 14. No. 3 Recovery Boiler Excess Emissions and Downtime Summary Opacity

Excess Emissions Summary		
Reason for Excess Emissions	Duration (minutes)	
	Over 35%	Over 20% for 60 minutes
A. Startup/Shutdown	6	120
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	292	1866
Fuel Problems	0	0
Other Known Cause	48	814
Other Unknown Cause	0	84
Total Number of Incidents	27	48
Excess Emissions/Process Operating Time	0.14%	N/A
Monitor Downtime Summary		
Reason for Monitor Downtime	Duration (minutes)	
Monitor Equipment Malfunctions	101	
Non-Monitor Equipment Malfunctions	0	
Quality Assurance	73	
Other Known Cause	79	
Other Unknown Cause	0	
Total Number of Incidents	10	
Percent Monitor Downtime	0.10%	

TV-2440-0005, Condition C.42

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; NSPS, Subpart BB NESHAP, Subpart MM
Description:	No. 3 Recovery Boiler Opacity

See Section TV-2440-0005, Condition C.41 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.44

Emission Unit IDs:	07
Equipment IDs:	2723, 2723C
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; NSPS, Subpart BB
Description:	No. 2 Lime Kiln

See Section TV-2440-0005, Condition C.39 of this Report and detailed information in Attachment A. The ton per day lime production on a 12-month rolling average basis did not exceed 465.0 tons per day (see Condition C.48) during the reporting period.

TV-2440-0005, Condition C.45

Emission Unit IDs:	07
Equipment IDs:	2700, 2701, 2725C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; CAM
Description:	Slaker Scrubber Flow

See detailed information in Attachment A.

TV-2440-0005, Condition C.46

Emission Unit IDs:	07
Equipment IDs:	2702, 2703, 2726C, 2724C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; CAM
Description:	Lime Silo Opacity

Daily visual inspections are conducted for visible emissions when unloading the lime silos. No abnormal emissions were observed during the reporting period.

TV-2440-0005, Condition C.48

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	SC Reg. 61-62.1, Section II(E) {General Requirements-Synthetic Minor}
Description:	No. 2 Lime Kiln Production

Production from the No. 2 Lime Kiln is limited to 169,725 tons per year on a 12-month rolling sum basis. Lime Kiln production for the reporting period is shown in Table 17.

Table 15. Lime Kiln 2 Production

Month	Tons per Day	12-Month Rolling Avg (TPD)	Monthly	12-Month Rolling Sum (tons)
January-20	368	344	11,408	125,601
February-20	345	343	10,005	125,666
March-20	293	337	9,083	123,527
April-20	334	335	10,020	122,687
May-20	295	328	9,145	120,207
June-20	291	342	8,730	125,367
July-20	310	334	9,610	122,360
August-20	318	329	9,858	120,283
September-20	235	323	7,050	118,093
October-20	0	291	0	106,437
November-20	157	277	4,710	101,337
December-20	23	247	712	90,331
January-21	133	228	4,111	83,034
February-21	285	223	7,985	81,014
March-21	228	217	7,075	79,005
April-21	210	207	6,314	75,299
May-21	263	204	8,144	74,298
June-21	252	201	7,553	73,121

TV-2440-0005, Condition C.51

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; SC Reg. 61-62.5, Standard No. 7.1 {NSR}
Description:	Recovery Boiler 3 NOx

NOx emissions from the No. 3 Recovery Furnace are limited to 78 ppmv @8% O₂. See detailed information regarding excess emissions and monitor downtime in Attachment A.

TV-2440-0005, Condition C.52

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}
Description:	Lime Kiln 2 NOx

Production from the No. 2 Lime Kiln is limited to 169,725 tons per year on a 12-month rolling sum basis. See Section TV-2440-0005, Condition C.48 of this Report.

TV-2440-0005, Condition C.53 and 2440-0005-DF C.15 and C.18

Emission Unit IDs:	07, 08
Equipment IDs:	2400, 2500, 5100, 5260, 5260C, 2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NSPS, Subpart BB and BBa
Description:	LVHC Scrubber

See detailed information in Attachment A for any variances from established parameters and appropriate corrective action taken during the reporting period. Attachment B includes summary information for excess emissions from the LVHC system under the 40 CFR Part 63, Subpart S report.

TV-2440-0005, Condition C.54

Emission Unit IDs:	07
Equipment IDs:	2505
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	No. 2 Recovery Boiler TRS

See detailed information regarding excess emissions and monitor downtime in Attachment A for monitor maintenance and monitor downtime. There were no periods of excess emissions above the applicable standard.

TV-2440-0005, Condition C.55

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; NSPS, Subpart BB
Description:	Recovery Boiler 3 TRS

No. 3 Recovery Furnace excess emissions of TRS are limited to 5 ppmv @ 8% O₂.

The Department will not consider periods of excess emissions to be indicative of a violation of 40 CFR 60, Subpart BB if the number of 12-hour exceedances from No. 3 Recovery Furnace is less than or equal to 1% of the total number of contiguous 12-hour periods in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the recovery furnace is not operating). Monitor downtime and excess emissions for the reporting period were 0.66% and 0.29% of operating time, respectively.

Detailed information regarding excess emissions and monitor downtime is provided in Attachment A.

TV-2440-0005, Condition C.56

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	NSPS, Subpart Db; SC Reg. 61-62.1, Section II(J)(2) {Special Permit Conditions}
Description:	Recovery Boiler 3 Fossil Fuel Capacity Factor

Fuel consumption from the No. 3 Recovery Furnace is included in Table 16.

Table 16. No. 3 Recovery Furnace Fuel Consumption

Month	12-Month Rolling Sum			ACF (%)
	Softwood Pulping Liquor (OD Short Tons)	Natural Gas at 68°F (SCF)	Heavy Fuel Oil (gallons)	
January-20	512,762	159,161,041	679,334	5.76
February-20	517,660	162,647,468	637,438	5.70
March-20	515,589	126,792,463	698,184	5.11
April-20	513,728	96,996,157	717,143	4.51
May-20	504,826	113,348,851	744,225	4.96
June-20	542,103	85,880,732	414,956	3.28
July-20	529,919	91,131,704	439,477	3.47
August-20	514,388	103,609,858	499,565	3.95
September-20	475,804	96,675,363	592,653	4.10
October-20	426,949	100,410,419	594,762	4.19
November-20	386,572	208,061,548	632,664	6.74
December-20	339,925	285,289,081	881,732	9.28
January-21	331,851	329,175,981	1,145,936	11.13
February-21	331,022	338,250,064	1,189,120	11.47
March-21	331,302	346,784,000	1,124,274	11.45
April-21	325,416	335,093,517	1,128,670	11.20
May-21	332,502	321,174,067	1,125,285	10.88
June-21	323,722	320,089,470	1,124,602	10.85

TV-2440-0005, Condition C.57

Emission Unit IDs:	07
Equipment IDs:	2510, 5110, 2511C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NSPS BB; SC Reg. 61-62.5, Standard No. 7 {PSD}
Description:	Smelt Dissolving Tank Scrubber

See detailed information regarding excess emissions and monitor downtime in Attachment A. There were no excess emissions recorded during the reporting period.

TV-2440-0005, Condition C.58

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	NSPS, Subpart BB; SC Reg. 61-62.1, Section II(E) {General Requirements-Synthetic Minor Construction Permits}
Description:	No. 2 Lime Kiln TRS

See detailed information regarding excess emissions and monitor downtime in Attachment A. See Lime Kiln Production in Section TV-2440-0005, Condition C.48 of this Report.

TV-2440-0005, Condition C.59

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	SC Reg. 61-62.1, Section II(E) {General Requirements-Synthetic Minor Construction Permits}
Description:	No. 2 Lime Kiln VOC and Beryllium

See Lime Kiln Production in Section TV-2440-0005, Condition C.48 of this Report.

TV-2440-0005, Condition C.61

Emission Unit IDs:	08
Equipment IDs:	2550
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions From Fuel Burning Operations}
Description:	Power Boiler

The Power Boiler was permanently retired from service on August 12, 2020. Therefore, there were no excess emissions to report during the reporting period.

TV-2440-0005, Condition C.64

Emission Unit IDs:	08
Equipment IDs:	2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions From Fuel Burning Operations}
Description:	Combination Boilers 1 and 2 Opacity

See Section TV-2440-0005, Condition C.13 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.65

Emission Unit IDs:	08
Equipment IDs:	2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions From Fuel Burning Operations}
Description:	Combination Boilers 1 and 2 Opacity

See Section TV-2440-0005, Condition C.13 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.66

Emission Unit IDs:	02, 08
Equipment IDs:	5210, 5240, 2400, 5100, 2605, 3705, 5260, 5260C - affected sources and control devices for the optimization project to increase Kraft pulp yield (as permitted under construction permit-DC)
Regulation:	SC Reg. 61-62.5 Standard No. 1 {Emissions from Process Industries}; SC Reg. 61-62.5 Standard No. 7 {PSD}

Description:	TRS and SO ₂ from affected sources and control devices for the optimization project to increase Kraft pulp yield
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See Sections TV-2440-0005, Condition C.13, C.14, C.53, C.64, and C.65 of this Report and detailed information in Attachment A.

There were no exceedances of the wood rate/Kraft pulp production ratio or the PSD BACT limit for tons of SO₂ per year.

TV-2440-0005, Condition C.68

Emission Unit IDs:	08
Equipment IDs:	2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 3 {Waste Combustion and Reduction}
Description:	Combination Boiler Tire-Derived Fuel

Tire-Derived Fuel (TDF) monthly average hourly consumption is included in Table 19. TDF fuel usage is limited to less than or equal to 1.5 tons per hour of TDF. No exceedances occurred during the reporting period.

Table 17. Tire-Derived Fuel Consumption

Month	Short Tons TDF per hour	
	Combination Boiler 1	Combination Boiler 2
January-20	0.03	0.06
February-20	0.18	0.18
March-20	0.09	0.14
April-20	0.14	0.25
May-20	0.14	0.28
June-20	0.01	0.01
July-20	0.00	0.21
August-20	0.16	0.05
September-20	0.00	0.00
October-20	0.00	0.00
November-20	0.00	0.00
December-20	0.00	0.00
January-21	0.03	0.05
February-21	0.07	0.11
March-21	0.23	0.33
April-21	0.33	0.36
May-21	0.25	0.27
June-21	0.32	0.41

TV-2440-0005, Condition C.69

Emission Unit IDs:	08, 09
Equipment IDs:	2605, 3705, 5260, 5270, 9820, 5260C
Regulation:	NSPS BB; CAM

Description:	TRS Venting
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See Sections TV-2440-0005, Condition C.13, C.14, C.53, C.64, and C.65 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.71 and 2440-0005-DF, Condition C.15 and C.18

Emission Unit IDs:	09
Equipment IDs:	9800, 9801, 9820, 2605, 3705
Regulation:	NSPS BB and BBa; CAM
Description:	TRS Venting

See Sections TV-2440-0005, Condition C.13, C.14, C.53, C.64, and C.65 of this Report and detailed information in Attachment A. Attachment B includes summary information for excess emissions from the HVLC and LVHC systems under the 40 CFR Part 63, Subpart S report.

TV-2440-0005, Condition C.74

Emission Unit IDs:	11
Equipment IDs:	2900, 1100-Roads
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; SC Reg. 61-62.6 {Control of Fugitive Particulate Matter}
Description:	Landfill and Road Visible Emissions

Visual inspections are performed on a semi-annual basis during source operation. No abnormal emissions occurred during the reporting period.

TV-2440-0005, Condition C.75

Emission Unit IDs:	12
Equipment IDs:	1299 – HD Pulp Storage Tanks
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	HD Pulp Storage Tanks Visible Emissions

Visual inspections are performed on a semi-annual basis during source operation. No abnormal emissions occurred during the reporting period.

Attachment A
Excess Emissions and Continuous Emissions Monitor
Report Logs



ID 2605

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Combination Boiler No. 1

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.13, C.64, C.65

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

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ID 2605

New-Indy Catawba LLC
P.O. Box 7
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Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Combination Boiler No. 2

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.13, C.65

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				EP Bypass Time	Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)			
1	1/5/21	4:45 PM	41	x			6		Blowing the iks.	Reversed the ik.
2	1/8/21	10:00 AM	48	x			12		High steam demand during PM3 startup.	Adjusted fuel and air flows.
3	1/8/21	10:30 AM	50	x			12		High steam demand during PM3 startup.	Adjusted fuel and air flows.
4	1/8/21	12:12 PM	68	x			6		TR1 & TR2 tripped.	Reset.
5	1/8/21	2:54 PM	44	x			6		High steam demand during PM3 startup.	Adjusted fuel and air flows.
6	1/9/21	9:48 AM	77	x			6		High mill steam demand.	Adjusted air and changed oil guns.
7	1/9/21	6:24 PM	51	x			6		High mill steam demand.	Adjusted air and changed oil guns.
8	1/9/21	6:36 PM	48	x			6		High mill steam demand.	Adjusted air and changed oil guns.
9	1/14/21	4:54 PM	45	x			12		RB2 Tripped Offline resulting in a sudden load shift on CB2.	Shifted load between remaining boilers.
10	1/15/21	10:48 AM	72	x			18		Middle Precipitator field issues.	Reduced bark combustion. Cleaned precipitator fields.
11	1/16/21	10:00 AM	41	x			6		Precipitator inlet field tripped electrically.	Reset power to the inlet field.
12	1/16/21	10:12 AM	42	x			6		Precipitator inlet field tripped electrically.	Reset power to the inlet field.
13	1/16/21	10:24 AM	65	x			6		Precipitator inlet field tripped electrically.	Reset power to the inlet field.
1	2/1/21	3:38 PM	62	x			6		Precipitator fields wouldn't load up electrically.	Reduced bark combustion and adjusted precipitator fields.
2	2/4/21	12:00 PM	-	x			90		Quarterly systems audit.	None
3	2/4/21	4:00 PM	73	x			12		Uneven bark combustion feed rate impacting air/feed ratio.	Reduced bark combustion and adjusted air flows.
4	2/4/21	4:48 PM	41	x			6		Uneven bark combustion feed rate impacting air/feed ratio.	Reduced bark combustion and adjusted air flows.
5	2/28/21	5:12 PM	80	x			12		#2 TR Set issues	Reduced oil flow to the boiler.
1	3/10/21	6:42 AM	48	x			12		#1 TR Set Issues	Reduced bark feed rate into boiler.
2	3/10/21	8:24 PM	43	x			43		#1 TR & #2 TR Sets not loading.	Cleaned precipitators.
3	3/11/21	10:36 AM	50	x			18		Testing Boiler Trips	Started up precipitators.
4	3/11/21	12:06 PM	48	x			6		Testing Boiler Trips	Started up precipitators.
5	3/13/21	12:40 PM	-	x			49		Monitor in alarm.	Reset alarm and performed manual calibration



ID 2605

P.O. Box 7

5300 Cureton Ferry Road

Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Combination Boiler No. 2

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.13, C.65

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

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New-Indy Catawba LLC
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CONTINUOUS EMISSION MONITOR REPORT LOG

High Volume Low Concentration Gas System

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.13; 2440-0005-DF C.15 and C.18

This report is for indicated emissions from the fiberline, pulp washing systems, oxygen delignification, and screening/knotting systems exceeding 5 minutes duration, or permit condition exceptions.

No.	Began	Ended	HVLC System Leg	Duration (Minutes)	Estimated Emissions (lbs/episode)		Nature and Cause of Incident	Corrective Action
					TRS (as S)	Methanol		
1	1/8/2021 12:14 AM	1/8/2021 12:20 AM	PH:HVLC	6	2.1	0.0	High pressure at vent.	Manually closed the auto vent.
2	1/18/2021 8:53 AM	1/18/2021 2:41 PM	FL: HVLC	348	325.3	0.1	Chip feed system issues resulting in high temperatures.	Stabilized the chip feed system.
There were no excursion events or downtime during the month of February 2021.								
1	3/19/2021 8:50 PM	3/19/2021 8:59 PM	FL: HVLC	9	0.0	0.0	High chip bin temperature during fiberline startup.	Started up mill and reduced steam feed to the chip bin.
2	3/27/2021 8:34 PM	3/29/2021 8:32 AM	FL: HVLC	2158	740.0	341.4	Chip Bin NCG Fan venting due to turpentine cooler exhaust temperature > 120 F. Operations cleared the interlock cleared and the returned the system to collect mode. However, the sequence did not complete and allowed the selector collect/vent to remain in collect even though the vent valve remained in the open position.	A redundant alarm was programmed on the Chip Bin NCG Fan Vent valve limit switch. Operations developed an operator basic care round to field-verify vent valves and rupture discs valve settings.
There were no excursion events or downtime during the month of April 2021.								
There were no excursion events or downtime during the month of May 2021.								
1	6/10/2021 2:43 PM	6/10/2021 3:00 PM	PH: HVLC	17	8.8	0.0	CB1 Fan Tripped.	Swapped gases to CB2
2	6/12/2021 3:47 PM	6/12/2021 7:05 PM	FL: HVLC	198	701.3	0.2	HVLC Rupture Disk failure	Replaced the rupture disk.

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CONTINUOUS EMISSION MONITOR REPORT LOG

Lime Kiln No. 2

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.39, C.44

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

[illegible]



ID 2510, ID 5110

New-Indy Catawba LLC
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Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Smelt Dissolving Tank Vent Scrubber

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.40, C.57

This report is for variations outside of surrogate monitoring parameters or permit exception conditions.

No.	Date	Start Time	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Pump Pressure, Flow, delta P			
There were no excursion events or downtime during the month of January 2021.						
There were no excursion events or downtime during the month of February 2021.						
There were no excursion events or downtime during the month of March 2021.						
There were no excursion events or downtime during the month of April 2021.						
There were no excursion events or downtime during the month of May 2021.						
There were no excursion events or downtime during the month of June 2021.						



New-Indy Catawba LLC
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Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Recovery Boiler No. 3

ID 5105

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.41, C.42

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	1/8/21	9:45 AM	-	x			15	Stack alignment and clean lenses	None
2	1/8/21	9:59 AM	Avg>20%	x			148	High steam demand due to PM3 startup.	Reduced liquor flows. Inspected precipitator operation.
3	1/9/21	7:18 PM	45	x			12	Precipitator issues	Repaired #6 top rapper, adjusted air flow to boiler.
4	1/9/21	8:06 PM	37	x			6	Precipitator issues	Repaired #17 top rapper, adjusted air flow to boiler.
5	1/9/21	7:12 PM	Avg>20%	x			216	Mechanical issues with #6 and #17 rappers.	Repaired rappers.
6	1/10/21	1:24 AM	Avg>20%	x			48	Plugged dry hopper on boiler.	Unplugged hopper, changed oil gun, manually operated rappers on precipitator
7	1/10/21	3:30 AM	Avg>20%	x			66	Plugged dry hopper on boiler.	Unplugged hopper, changed oil gun, manually operated rappers on precipitator
8	1/10/21	6:00 AM	Avg>20%	x			30	Plugged dry hopper on boiler.	Unplugged hopper, changed oil gun, manually operated rappers on precipitator
9	1/10/21	1:12 PM	Avg>20%	x			12	3 rappers not working.	Returned the rappers to operation.
10	1/11/21	2:18 AM	Avg>20%	x			24	3 rappers not working.	Returned the rappers to operation.
1	2/3/21	1:40 PM	-	x			65	STI Quarterly Systems Audit	None - quarterly lens audit.
2	2/7/21	2:06 AM	Avg>20%	x			180	Increased steam loading on boiler due to bark feed system plugging on the Combination Boilers.	Adjusted the black liquor nozzle pressure and air flow to the boiler.
3	2/7/21	4:18 AM	42	x			6	Increased steam loading on boiler due to bark feed system plugging on the Combination Boilers.	Adjusted the black liquor nozzle pressure and air flow to the boiler.
4	2/9/21	9:12 AM	Avg>20%	x			78	High liquor burning rate.	Adjusted air flow to boiler.
5	2/19/21	5:35 PM	-	x			14	Dirty Lens	Changed filters on monitor
6	2/22/21	8:10 AM	-	x			50	Monitor Fault	Replaced Filters
7	2/22/21	8:16 PM	-	x			1	Bad Pressure Switch.	Replaced switch.
8	2/23/21	1:06 AM	70	x			24	TR1 & TR2 tripped offline.	Reset fields. Cut liquor flow.
9	2/23/21	1:12 AM	Avg>20%	x			72	TR1 & TR2 tripped offline.	Reset fields. Cut liquor flow.
10	2/23/21	9:10 AM	-	x			12	Bad Purge Switch.	Replaced the switch.

Permit Conditions: TV-2440-0005 C.41, C.42

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	3/6/21	9:00 AM	Avg>20%	x			90	TR2 tripped offline.	Reset field. Cut liquor flow.
2	3/23/21	9:09 PM	-	x			4	Stack alignment issues.	Aligned stack, cleaned lens.
3	3/23/21	9:18 PM	36	x			6	East Inlet Fields on Precipitator Tripped offline.	Reset fields.
4	3/23/21	9:18 PM	Avg>20%	x			18	East Inlet Fields on Precipitator Tripped offline.	Reset fields.
5	3/26/21	2:24 AM	41	x			6	Closing inlet gate to precipitator for inspection.	Reduced air, pulled liquor gun.
6	3/26/21	2:24 AM	Avg>20%	x			36	Closing inlet gate to precipitator for inspection.	Reduced air, pulled liquor gun.
7	3/26/21	5:42 AM	61	x			12	Closing inlet gate to precipitator for inspection.	Reduced air, pulled liquor gun.
8	3/26/21	5:42 AM	Avg>20%	x			60	Closing inlet gate to precipitator for inspection.	Reduced air, pulled liquor gun.
9	3/31/21	2:12 PM	57	x			12	TR3 tripped offline.	Reset the power to TR3.
10	3/31/21	1:30 PM	Avg>20%	x			12	TR3 tripped offline.	Reset the power to TR3.
11	3/31/21	1:54 PM	Avg>20%	x			66	TR3 tripped offline.	Reset the power to TR3.
1	4/3/21	8:18 PM	Avg>20%	x			6	TR3 tripped offline.	Reset the power to TR3.
2	4/10/21	4:00 PM	Avg>20%	x			42	Precipitator Issues	Reduced air flow through boiler.
3	4/10/21	7:54 PM	Avg>20%	x			24	Precipitator Issues	Reduced air flow through boiler.
4	4/12/21	12:18 PM	Avg>20%	x			42	Precipitator Issues	Reduced liquor burning rate.
5	4/13/21	5:24 PM	Avg>20%	x			6	Precipitator Issues	Reduced liquor burning rate.
6	4/16/21	9:00 AM	45	x			6	#1 TR Field Down.	Reset power to the field.
7	4/19/21	6:00 PM	Avg>20%	x			18	East TR3 Tripped.	Reduced liquor burning rate and adjusted air.
8	4/19/21	7:12 PM	Avg>20%	x			96	East TR3 Tripped.	Reduced liquor burning rate and adjusted air.
9	4/21/21	2:48 AM	Avg>20%	x			78	East TR3 Tripped.	Reduced liquor burning rate and adjusted air.
10	4/21/21	4:12 AM	Avg>20%	x			162	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
11	4/21/21	4:18 AM	64	x			42	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.



New-Indy Catawba LLC
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CONTINUOUS EMISSION MONITOR REPORT LOG

Recovery Boiler No. 3

ID 5105

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.41, C.42

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
12	4/21/21	5:42 AM	50	x			12	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
13	4/21/21	8:36 AM	40	x			12	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
14	4/21/21	8:36 AM	Avg>20%	x			60	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
15	4/21/21	11:18 AM	70	x			6	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
16	4/21/21	11:30 AM	40	x			6	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
17	4/21/21	11:30 AM	Avg>20%	x			48	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
18	4/21/21	1:36 PM	40	x			12	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
19	4/21/21	1:36 PM	Avg>20%	x			198	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
20	4/21/21	2:06 PM	57	x			48	Bypassed east precipitator to perform scheduled maintenance on the unit.	Reduced liquor burning, adjusted air flow.
21	4/22/21	9:36 AM	63	x			6	Precipitator maintenance.	Switched to #6 fuel oil and reduced liquor burning.
22	4/22/21	10:06 AM	Avg>20%	x			30	Precipitator maintenance.	Switched to #6 fuel oil and reduced liquor burning.
1	5/4/21	11:23 AM	-	x			54	Quarterly systems audit.	None
2	5/25/21	12:54 PM	Avg>20%	x			18	High steam demand due to PM3 startup.	Reduced liquor flows. Inspected precipitator operation.
3	5/25/21	3:42 PM	Avg>20%	x			30	High steam demand due to PM3 startup.	Reduced liquor flows. Inspected precipitator operation.
4	5/25/21	7:54 PM	Avg>20%	x			36	CB1 issues. Increased steam demand.	Reduced liquor flows.
1	6/12/21	11:44 AM	-	x			13	Moisture interference in the monitor system.	Cleaned and dried out the monitor collection system. Performed manual calibration.
2	6/13/21	11:00 AM	48	x			12	Tube leak, resulting in precipitator tripping out.	Pulled liquor.
3	6/13/21	11:18 AM	Avg>20%	x			72	Tube leak, resulting in precipitator tripping out.	Pulled liquor.
4	6/13/21	12:42 PM	Avg>20%	x			6	Tube leak, resulting in precipitator tripping out.	Pulled liquor.
5	6/13/21	1:00 PM	41	x			6	Tube leak, resulting in precipitator tripping out.	Pulled liquor.



CONTINUOUS EMISSION MONITOR REPORT LOG

Recovery Boiler No. 3

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.41, C.42

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

[illegible]



New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Slaker Scrubber

ID 2725C

Report Period 1/1/2021 to 6/30/2021

Permit Condition: TV-2440-0005 C. 45 and C.46

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

No.	Date	Start Time	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Flow			
There were no excursion events or downtime during the month of January 2021.						
There were no excursion events or downtime during the month of February 2021.						
There were no excursion events or downtime during the month of March 2021.						
There were no excursion events or downtime during the month of April 2021.						
There were no excursion events or downtime during the month of May 2021.						
There were no excursion events or downtime during the month of June 2021.						



Permit Condition: TV-2440-0005 C.51

This report is for indicated excessive NOx (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

Recovery Boiler No. 3

Report Period 1/1/2021 to 6/30/2021[illegible]



ID 5260C

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Low Volume High Concentration Gas System

Report Period 1/1/2021 to 6/30/2021

Permit Condition: TV-2440-0005 C.53

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

No.	Date	Start Time	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Flow and pH			
There were no excursion events or downtime during the month of January 2021.						
There were no excursion events or downtime during the month of February 2021.						
There were no excursion events or downtime during the month of March 2021.						
There were no excursion events or downtime during the month of April 2021.						
There were no excursion events or downtime during the month of May 2021.						
There were no excursion events or downtime during the month of June 2021.						



ID 2400, ID 2605, ID 3705

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Low Volume High Concentration Gas System

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.53; 2440-0005-DF C.15 and C.18

This report is for indicated emissions from the digester and/or multiple effect evaporator systems exceeding 5 minutes duration, or permit condition exceptions.

No.	Date	Start Time	LVHC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
1	1/5/2021	11:05 AM	LVHC - All	19	Fault in the fiberline control system	Reset fault.
2	1/7/2021	11:40 PM	LVHC - PH	17	TG2 tripped. Low pressure in collection system.	Restored flow to collection system.
3	1/8/2021	12:14 AM	LVHC - All	22	High pressure on the LVHC vent.	Manually closed the auto vent.
4	1/14/2021	5:51 AM	LVHC - All	7	High pressure on the LVHC vent.	Manually closed the auto vent.
5	1/16/2021	1:47 PM	LVHC - All	6	High pressure on the LVHC vent.	Manually closed the auto vent.
6	1/22/2021	4:42 AM	LVHC - All	9	Low flow, resulting in the vent valve not closing.	Manually closed the auto vent.
7	1/22/2021	6:19 AM	LVHC - All	5	Low flow, resulting in the vent valve not closing.	Manually closed the auto vent.
1	2/2/2021	8:21 AM	LVHC - All	5	Lost LVHC gas flow to burner.	Manually closed the auto vent.
1	3/5/2021	7:00 PM	LVHC - All	25	Low 150 lb. steam header pressure due to RB3 tripping offline.	Restarted RB3.
2	3/10/2021	10:08 AM	LVHC - All	21	Low 150 lb. steam header pressure - mill down for maintenance upgrades.	Pressurized the steam header. Reset the LVHC system.
3	3/10/2021	4:27 PM	LVHC - All	14	Low 150 lb. steam header pressure - mill down for maintenance upgrades.	Pressurized the steam header. Reset the LVHC system.
4	3/10/2021	10:08 PM	LVHC - All	13	Low 150 lb. steam header pressure - mill down for maintenance upgrades.	Pressurized the steam header. Reset the LVHC system.
5	3/13/2021	11:30 PM	LVHC - All	54	Low 150 lbs. steam header pressure due to wet bark.	Restored header pressure.
6	3/26/2021	1:50 PM	LVHC - All	8	Valve stuck on #3 Evaporator.	Manually closed valve.
7	3/27/2021	11:13 AM	LVHC - All	29	Low 150 lb. steam header pressure.	Restored header pressure.



ID 2400, ID 2605, ID 3705

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Low Volume High Concentration Gas System

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C.53; 2440-0005-DF C.15 and C.18

This report is for indicated emissions from the digester and/or multiple effect evaporator systems exceeding 5 minutes duration, or permit condition exceptions.

No.	Date	Start Time	LVHC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
1	4/8/2021	7:53 AM	LVHC - All	7	Low 150# Steam Header Pressure.	Restored header pressure.
There were no excursion events or downtime during the month of May 2021.						
1	6/6/2021	2:22 PM	LVHC - All	6	Burner flame tripped.	Relit burner.
2	6/7/2021	12:52 PM	LVHC - All	8	Burner flame tripped.	Relit burner.
3	6/10/2021	2:51 PM	LVHC - All	8	CB1 LVHC fan tripped.	Transferred gases to CB2
4	6/10/2021	3:09 PM	LVHC - All	8	CB1 LVHC fan tripped.	Issues transferring gases to CB2. Switch completed.
5	6/12/2021	5:00 PM	LVHC - FL	159	LVHC Rupture Disk failed.	Replaced Rupture Disc
6	6/15/2021	10:52 AM	LVHC - PH	4	Replaced the plc genius block	None
7	6/17/2021	7:44 AM	LVHC - PH	8	Low 150# steam header pressure.	Increased header pressure.
8	6/17/2021	8:13 AM	LVHC - PH	7	Low 150# steam header pressure.	Increased header pressure.
9	6/17/2021	8:41 AM	LVHC - PH	6	Low 150# steam header pressure.	Increased header pressure.
10	6/17/2021	10:18 AM	LVHC - PH	6	Low 150# steam header pressure.	Increased header pressure.
11	6/19/2021	6:37 AM	LVHC - PH	5	Low 150# steam header pressure.	Increased header pressure.
12	6/19/2021	7:12 AM	LVHC - PH	5	Low 150# steam header pressure.	Increased header pressure.
13	6/19/2021	7:17 AM	LVHC - #3 Evaporator	11	Rupture Disc Failure	Replaced Rupture Disc
14	6/19/2021	7:29 AM	LVHC - #3 Evaporator	3	Rupture Disc Failure	Replaced Rupture Disc
15	6/19/2021	9:29 PM	LVHC - #3 Evaporator	3	Rupture Disc Failure	Replaced Rupture Disc
16	6/20/2021	7:00 AM	LVHC - #3 Evaporator	14	Low 150# steam header pressure.	Increased header pressure.



ID 2505

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Recovery Boiler No. 2

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C54

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	1/3/21	6:00 AM	-		x		60	Failed daily calibration due to plugged inductor	Cleaned inductor, verified blowback working and performed another calibration
2	1/4/21	5:30 AM	-		x		60	Failed daily calibration due to plugged inductor	Cleaned inductor, verified blowback working and performed another calibration
3	1/12/21	2:20 PM	-		x		85	Quality Assurance	Cleaning and calibration
4	1/13/21	8:00 AM	-		x		180	Quality Assurance - Failed daily calibration of the Oxygen span.	Changed the citi-cell and re-calibrated the zero and span pots. Performed manual calibration.
5	1/16/21	7:25 AM	-		x		135	Plugged orifice.	Cleaned orifice. Changed calibration gas bottle. Performed manual calibration.
6	1/17/21	6:10 PM	-		x		340	Plugged orifice.	Cleaned orifice. Replaced nozzle. Performed manual calibration.
7	1/20/21	2:39 AM	-		x		87	Plugged orifice.	Cleaned orifice and performed manual calibration.
8	1/20/21	6:37 AM	-		x		58	Plugged orifice.	Cleaned orifice and performed manual calibration.
9	1/21/21	6:30 AM	-		x		30	Failed daily calibration	Performed manual calibration. Passed.
10	1/21/21	8:30 AM	-		x		120	Intermittent Readings, spiking up and down.	Found ice in the TE cooler. Cleaned probe eductor, replaced tubing and performed manual calibration.
11	1/22/21	6:30 AM	-		x		40	Failed morning calibration.	Performed manual calibration. Passed.
12	1/22/21	8:30 AM	-		x		240	Meter reading high due to plugged sample line.	Cleaned the inductor, filter and inline filter. Blew out the sample lines.
13	1/26/21	5:26 AM	-		x		68	Monitor fault.	Cleaned the orifice and jet. Performed a manual calibration. Passed.
14	1/28/21	9:55 AM	-		x		170	Ice buildup in the blowback valve.	Cleared the ice and performed a manual calibration.



ID 2505

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Recovery Boiler No. 2

Report Period 1/1/2021 to 6/30/2021

Permit Conditions: TV-2440-0005 C54

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	2/4/21	9:45 AM	-		x		90	Monthly preventive maintenance.	Replaced scrubber assembly.
2	2/6/21	9:30 AM	-		x		90	Water in system.	E&I conducted blowback on system. Ran a manual calibration.
3	2/8/21	12:30 PM	-		x		160	Failed calibration.	Changed transport pump.
4	2/11/21	6:30 AM	-		x		30	Failed calibration.	Ran a manual calibration. Passed.
5	2/11/21	1:00 PM	-		x		75	Blowback not working.	Reset blowback timer in PLC. Lengthened the tube in the cooler.
6	2/18/21	8:30 AM	-		x		90	Failed calibration.	Cleaned orifice. Replaced TRS bottle. Performed manual calibration
7	2/19/21	8:30 AM	-		x		180	Failed calibration.	TE cooler iced up, plugging eductor. Thawed out cooler. Changed orifice. Performed manual calibration.
8	2/25/21	8:30 AM	-		x		150	Failed calibration.	TE cooler iced up, plugging eductor. Thawed out cooler. Changed orifice. Performed manual calibration.
1	3/1/21	8:20 AM	-		x		120	Failed calibration.	TE cooler iced up, plugging eductor. Thawed out cooler. Changed orifice. Performed manual calibration.
2	3/4/21	1:20 PM	-		x		70	Low calibration gas bottle.	Replaced bottle and performed a manual calibration.
3	3/5/21	8:30 AM	-		x		180	Failed calibration.	Eductor plugged. Changed probe filter, cleaned orifice. Performed manual calibration
4	3/6/21	8:15 AM	-		x		135	Failed calibration.	Eductor plugged. Cleaned orifice. Performed manual calibration
5	3/8/21	9:45 AM	-		X		335	Failed calibration.	Replaced both filters on stack, tightened fittings and cleaned orifice. Performed manual calibration.



CONTINUOUS EMISSION MONITOR REPORT LOG

Recovery Boiler No. 2

Report Period 1/1/2021 to 6/30/2021

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

[illegible]



New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

Recovery Boiler No. 3

Permit Condition: TV-2440-0005 C.55

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

[illegible]

[illegible]



ID 9801 TV

New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704

CONTINUOUS EMISSION MONITOR REPORT LOG

Condensate Steam Stripper

Report Period 1/1/2021 to 6/30/2021

Permit Condition: MACT.2

This report is for variations outside of 15-day average collection (11.1 #/ODTP) and treatment (10.2 #/ODTP).

No.	Date	Start Time	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Flow and Steam			
					There were no excursion events or downtime during the month of January 2021.	
					There were no excursion events or downtime during the month of February 2021.	
					There were no excursion events or downtime during the month of March 2021.	
					There were no excursion events or downtime during the month of April 2021.	
					There were no excursion events or downtime during the month of May 2021.	
					There were no excursion events or downtime during the month of June 2021.	

Attachment B

Additional NESHAP, Subpart S, Subpart MM, and
Subpart JJJJ Requirements

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Chlorine

Time Period: 3-Hour Average

Reporting Period: January 1, 2021 through June 30, 2021

Process Unit Description: Bleach Plant Scrubber System

Emission Limits: **The bleaching system was permanently shut down on September 5, 2020 as the mill has been reconfigured to produce unbleached pulp. The New-Indy Catawba Mill is no longer subject to the requirements contained in 40 CFR 63.445. This will be the last report submitted for the bleaching system.**

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: N/A Hour

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	N/A Hour
B. Malfunctions	
Process/Instrument System	N/A Hour
Control/Operating/Collection	N/A Hour
Other Known Cause	N/A Hour
Other Unknown Cause	N/A Hour
Total Number of Incidents	N/A
Excess Emissions / Process Operating Time	N/A %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	N/A Hour
Non-Monitor Equipment Malfunctions	N/A Hour
Quality Assurance/Quality Assurance Calibrations	N/A Hour
Other Known Causes	N/A Hour
Other Unknown Causes	N/A Hour
Total Number of Incidents	N/A
Percent Monitor Downtime	N/A %

The bleaching system continuous monitoring systems, processes, and control devices were permanently shut down on September 5, 2020.

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	15-day rolling average
Reporting Period:	January 1, 2021 through June 30, 2021
Process Unit Description:	Condensate Collection and Treatment System
Emission Limits:	Collect 7.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3)) Treat (remove) 6.6 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(4)) or reduce methanol 92% or more by weight (40 CFR 63.446 (e)(3))
Operating Parameters:	To be determined following the completion of the Initial Performance Test (IPT) in July 2021 while operating as an unbleached mill.
Monitor Manufacturer(s) and Model Number(s):	To be determined following the completion of the Initial Performance Test (IPT) in July 2021 while operating as an unbleached mill.
Last CMS Certification or Audit Date:	To be determined following the completion of the Initial Performance Test (IPT) in July 2021 while operating as an unbleached mill.
Total Source Operating Time in Reporting Period:	3,675 Hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	N/A Hour
B. Malfunctions	
Process/Instrument System	N/A Hour
Control/Operating/Collection	N/A Hour
Fuel Problems	N/A Hour
Other Known Cause	N/A Hour
Other Unknown Cause	N/A Hour
Total Number of Incidents	N/A
Excess Emissions / Process Operating Time	N/A %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	N/A
Non-Monitor Equipment Malfunctions	N/A
Quality Assurance/Quality Assurance Calibrations	N/A
Other Known Cause	N/A
Other Unknown Cause	N/A
Total Number of Incidents	N/A
Percent Monitor Downtime	N/A

The continuous monitoring systems, processes, and control devices will be determined following the completion of the Initial Performance Test (IPT) in July 2021 while operating as an unbleached mill. The New-Indy Catawba Mill ceased operating as a bleached paper mill on September 5, 2020.

SEMI-ANNUAL REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Reporting Period: January 1, 2021 through June 30, 2021

Process Unit Description: Condensate Collection and Treatment System

Company: New Indy Catawba LLC – Catawba Mill

Emission Limits: Collect 7.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3))
Treat (remove) 6.6 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(4))
or reduce methanol 92% or more by weight (40 CFR 63.446 (e)(3))

Operating Parameters: To be determined following the completion of the Initial Performance Test (IPT) in July 2021 while operating as an unbleached mill.

§63.10(c)(5): Date / time during which the CMS was inoperative except for zero and high-level checks:	N/A
§63.10(c)(6): Date / time during which the CMS was out of control:	N/A
§63.10(c)(7): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during startups, shutdowns, and malfunction of the affected source:	N/A
§63.10(c)(8): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during periods other than startups, shutdowns, and malfunction of the affected source:	N/A
§63.10(c)(10): Nature and cause of any malfunction:	N/A
§63.10(c)(11): Corrective action taken or preventive measures adopted:	N/A
§63.10(c)(12): Nature of repairs or adjustments to the CMS that was inoperative or out of control:	N/A
§63.10(c)(13): Total process operating time during the reporting period:	3,675 Hours
§63.8(c)(7) and (8): Reporting requirements for a CMS that is out of control:	N/A

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Reporting Period: January 1, 2021 through June 30, 2021

Process Unit Description: LVHC System – Combination Boilers

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1%.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 3,675 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	1.22 Hours
B. Malfunctions	
Process/Instrument System	0.38 Hours
Control/Operating/Collection	0 Hour
Other Known Cause	7.10 Hours
Other Unknown Cause	0 Hour
Total Number of Incidents	32
Excess Emissions / Process Operating Time	0.16 %

CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems or control devices since the last reporting period. The process was converted from producing bleached pulp to unbleached pulp.

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Reporting Period: January 1, 2021 through June 30, 2021

Process Unit Description: HVLC System – Combination Boilers

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4%.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 3,675 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	5.95 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	39.7 Hours
Other Unknown Cause	0 Hour
Total Number of Incidents	6
Excess Emissions / Process Operating Time	1.24 %

CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems or control devices since the last reporting period. The process was converted from producing bleached pulp to unbleached pulp.

The location of Subpart MM information is detailed in Table MM-1 below. The information has also been uploaded to CEDRI as a PDF of this document as the 40 CFR §63.867(d)(2) Excess Emissions Report Excel template is in development. The information below reflects the January 1, 2021 through June 30, 2021 reporting period.

Table MM-1. Subpart MM Information

Equipment ID	Source Description	Subpart MM Information Location
2505	No. 2 Recovery Furnace	Main Report Section TV-2440-0005, Condition C.39
5105	No. 3 Recovery Furnace	Main Report Section TV-2440-0005, Condition C.41
2723	No. 2 Lime Kiln	Main Report Section TV-2440-0005, Condition C.39
2510, 5110	No. 2 and No. 3 Smelt Dissolving Tank Vent	Tables MM-2 and MM-3, below

Table MM-2. Smelt Dissolving Tank Opacity Monitoring

Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent
Pollutant:	Particulate Matter
Time Period:	Hours
Emission Limits:	0.2 lbs/ton BLS
Operating Parameters:	Differential Pressure > 1.5 inches of water column Liquid Flow Rate > 65 gpm
Monitor Manufacturer(s) and Model Number(s):	DP – Rosemount 3051CD2A02A1AM5E55 Liquid Flow Rate – Foxboro IMT25PDAB10N-AB
Last CMS Certification or Audit Date:	Audits: DP – Rosemount: 11/15/2020 Liquid Flow Rate – Foxboro: 11/15/2020
Total Source Operating Time in Reporting Period:	No. 2 Recovery Boiler: 4,167 Hours No. 3 Recovery Boiler: 4,158 Hours

Table MM-3. Smelt Dissolving Tank Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	Duration (hrs)	
	Differential Pressure Duration (hrs)	Liquid Flow Rate Duration (hrs)
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	0	0
Excess Emissions/Process Operating Time	0.00%	0.00%
Monitor Downtime Summary		
Reason for Monitor Downtime	Duration (hrs)	
Monitor Equipment Malfunctions	0	0
Non-Monitor Equipment Malfunctions	0	0
Quality Assurance	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	0	0
Percent Monitor Downtime	0.00%	0.00%

The No. 1 and No. 2 Paper Machine Coaters were permanently retired on September 5, 2020. The New-Indy Catawba Mill no longer manufactures coated paper and is no longer subject to the requirements contained in 40 CFR Part 63, Subpart JJJJ. The information below reflects the January 1, 2021 through June 30, 2021 reporting period. This will be the last report submitted for the No.1 and No. 2 Paper Machine Coaters.

Source	Description of Compliance	Operating Time (hrs)	Description and Cause of Deviations
No. 1 Paper Machine Coater	Each coating material as-applied contains less than 0.04 kg organic HAP per kg coating weight.	N/A	N/A
No. 2 Paper Machine Coater	Each coating material as-applied contains less than 0.04 kg organic HAP per kg coating weight.	N/A	N/A